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VIA ELECTRONIC FILING

CNECT-RSPG@ec.europa.eu

Re: DRAFT RSPG Work Programme for 2024 and Beyond, RSPG23-045 FINAL, 25 October 2023

Dear Radio Spectrum Policy Group,

Wi-Fi Alliance commends the Radio Spectrum Policy Group ("RSPG") on its ongoing work in the area of European spectrum planning. The public consultation on the [RSPG Draft Work Programme for 2024 and Beyond](#) ("Work Programme") will inform interested stakeholders and the RSPG efforts. Wi-Fi Alliance is grateful for the opportunity to provide views and recommendations on the proposed Work Programme's items listed below.

- **Long-term vision for the upper 6 GHz band (2030 and beyond)**

Wi-Fi Alliance support the stated objective of leveraging this spectrum towards Europe policy goals and connectivity targets. In this regard, Wi-Fi Alliance respectfully recommends that the RSPG include the following policy priorities as inputs under this work item:

- *Environmental sustainability* - consider how to leverage the upper-6 GHz spectrum policy to foster environmentally friendly wireless technologies. The upper-6 GHz band offers a unique opportunity to advance the EU's Digital Decade sustainability targets and the Green Deal objectives. Wi-Fi Alliance calls on the RSPG to take into account recently completed environmental impact [analysis of the 6.425-7.125 GHz spectrum policy](#).
- *Affordable communications for business and consumers* - consider that the 6 GHz Wi-Fi is implemented in many products that are already on the European market (e.g., flagship smartphones, laptops, access points, etc.), but these capabilities are impaired because Wi-Fi access to the upper-6 GHz band is precluded. European consumers pay a premium for the latest 6 GHz Wi-Fi enabled products with the expectation that they will experience optimal Wi-Fi performance and advanced features, but without access to the upper-6 GHz frequency band, Wi-Fi cannot support increased data throughput rates, ultra-low and deterministic latencies, better mobility, and high densities of users/devices. Wi-Fi Alliance respectfully asks the RSPG to develop a short-to-medium-term plan to enable Wi-Fi access to the upper-6 GHz band under the Work Programme for 2024. Delaying Wi-Fi access to the upper-6 GHz band until "2030 and beyond" would harm European consumers and impede technological development.
- *Technological Innovation* - consider that the upper-6 GHz is the only spectrum that is suitable for advanced functionality of the latest generations of Wi-Fi technology. This technology is designed to deliver optimal performance with multiple (e.g., 160 MHz or 320 MHz) channels

which can only be implemented with licence-exempt access to the entire 5.945 – 7.125 GHz band. Without access to the 6.425 -7.125 GHz spectrum, European consumers and enterprises will miss out on the full benefits of Wi-Fi 6E, Wi-Fi 7 and future generations of Wi-Fi technologies. Curtailed licence-exempt access limited to the 5.945 - 6.425 GHz band, which is currently available in Europe, is not sufficient for optimal Wi-Fi performance in terms of latency and data throughput.

- *Maximizing benefits of radio spectrum resources* - consider the Wireless Broadband Electronic Communications Services (WBB ECS) spectrum needs holistically, in the context of existing spectrum allocations. The WBB ECS already has access to multiple alternative spectrum bands. Wi-Fi Alliance respectfully asks the RSPG to take into account that existing WBB ECS allocations in mid-band are still underutilized. According to the 5G Observatory [Report](#), the “5G Pioneer Bands” designation, assignments stand at 60 percent. Such spectrum reservations are contrary to the EU’s technological and connectivity objectives.

- **6G Strategic Vision**

- Wi-Fi Alliance shares the RSPG view that strategic guidance on spectrum is essential to the 6G advancement in Europe. In this regard, Wi-Fi Alliance respectfully recommends for the RSPG to consider that the 6G connectivity use cases are transitioning away from wide-area, ubiquitous coverage and onto virtualization, edge computing and automation for the enterprise. This transition is underpinned by gigabit Wi-Fi in conjunction with the FTTH. The 6G use cases such as automation, AR/VR, or holography will mainly rely on short-range, gigabit-throughput, and low latency capabilities of local area networks (i.e., Wi-Fi). Hence, Europe’s spectrum policy towards 6G leadership must take into account advancements in Wi-Fi technology and support it with necessary licence-exempt access.

Wi-Fi Alliance appreciates the opportunity to contribute to the RSPG efforts.

Respectfully submitted,
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